

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

VITA 4 LIFE, INC.,

Plaintiff,

v.

CYNOSURE, INC.,

Defendant.

Case No. 17-cv-11435

DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME

NOW COMES Defendant, CYNOSURE, INC., by and through its attorneys, and respectfully requests that this Court extend the deadline for filing its answer or other response to Plaintiff’s Class Action Complaint to August 31, 2017. In support thereof, Defendant states as follows:

1. Defendant filed its Notice of Removal to Federal Court on August 3, 2017. (Dkt. # 1.)
2. Defendant’s answer or other response to Plaintiff’s Class Action Complaint is currently due on August 10, 2017. *See* Fed. R. Civ. P. 81(c)(2)(C).
3. Due to the press of other business, Defendant respectfully requests that this Court extend the deadline for Defendant to file its response to Plaintiff’s Class Action Complaint by 21 days, or until August 31, 2017.
4. Counsel for Defendant conferred with counsel for the Plaintiff prior to the filing of this motion, and Plaintiff’s counsel indicated he has no objection to the relief requested herein.

WHEREFORE, Defendant, CYNOSURE, INC., respectfully requests that this Honorable

Court enter an order extending the deadline for Defendant to respond to Plaintiff's Class Action Complaint by 21 days, up to and including August 31, 2017.

Respectfully submitted,

Counsel for Defendant, CYNOSURE, INC.,

/s/ Tamar Lanuza Hagopian
Tamar Lanuza Hagopian, BBO #665538
Litchfield Cavo, LLP
6 Kimball Lane, Suite 200
Lynnfield, MA 01940
(781) 309-1500 – Tel
(781) 246-0167 – Fax
hagopian@litchfieldcavo.com

CERTIFICATE OF SERVICE

The undersigned certifies that on August 4, 2017, a true copy of the foregoing **Defendant's Motion for Extension of Time** was served on the Clerk of Court and all Attorneys of Record via electronic filing, and was served on the following by first class mail, postage prepaid:

Lauren Guth Barnes
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142

Elizabeth A. Fegan
Mark T. Vazquez
455 Cityfront Plaza Drive, Suite 2410
Chicago, IL 60611

Steve W. Berman
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101

David Freydin
Timothy A. Scott
Freydin Law Firm LLP
8707 Skokie Blvd, #305
Skokie, IL 60077

/s/ Tamar Lanuza Hagopian
Tamar Lanuza Hagopian, BBO #665538

[x] Pursuant to 28 USC Section 1746(2), I certify under penalty of perjury that the foregoing is true and correct.

Executed on: August 4, 2017.

/s/ Tamar Lanuza Hagopian